



Telecommunications for the Deaf and Hard of Hearing, Inc.  
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September 26, 2019

*via ECFS and e-mail*

Marlene H. Dortch  
Secretary, Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

Re: CG Docket Nos. 03-123, 05-231, 10-51, and 13-24  
PSHSB Docket Nos. 10-255 and 11-153

Dear Ms. Dortch,

On September 24, 2019, I met with Diane Burstein, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau, Federal Communications Commission regarding the above-referenced dockets.

I congratulated Ms. Burstein on her new responsibilities at the FCC with CGB. TDI values its productive working relationship with the Commission and the Disability Rights Office (DRO). The national deaf and hard of hearing community has benefited significantly from participating in the FCC's rulemaking activities, including its electronic comment filing system and the Disability Advisory Committee. Last but not least, I also commended the presentation by Ms. Debra Patkin, one of the DRO's attorney advisors, on September 18 before the deaf and hard of hearing community in a state government-sponsored event in Fayetteville, NC.

I reiterated points raised in recent years by TDI and other deaf and hard of hearing consumer groups on which we would appreciate timely action by the Commission:

- a.) **Text-to-9-1-1.** There is a critical need for accelerated deployment of text-to-911 service with over 6,000 PSAPs across the nation. I encouraged Ms. Burstein and DRO staff to meet regularly via interagency coordination with the Civil Rights section at the Department of Justice (DOJ). Five years after the order<sup>1</sup> [requiring cellular carriers to carry texts to 911], we now have 30 percent participation from the PSAPs in America.<sup>2</sup> This will have a

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<sup>1</sup> <https://ecfsapi.fcc.gov/file/7521759385.pdf>

<sup>2</sup> <https://www.fcc.gov/files/text-911-master-psap-registryxlsx>

significant effect on the success we aim to achieve with another new technology—Real-Time Text (RTT).

**b.) TRS Issues.**

- i.) **Skills-based routing.** TDI and its sister consumer groups have patiently waited for at least five years for the Commission to authorize skills-based routing trials for VRS. I noted several examples of how this would significantly benefit the community, including phone contacts with lawyers, financial advisors, and doctors and nurses.<sup>3</sup>
- ii.) **ASR-Based IP CTS Offerings.** TDI and its sister consumer groups have asked the Commission to develop a framework to more thoroughly evaluate applications to provide Automatic Speech Recognition (ASR)-based IP-CTS service. For the IP CTS experience to be functionally equivalent to telephone service, the Commission must create rigorous mandatory minimum standards for quality, privacy and 911 connectivity. In its previous term, the Disability Advisory Committee gave the Commission a recommendation two years for a set of metrics for IP-CTS.<sup>4</sup> At a bare minimum, the Commission should apply the existing human-centric CA requirements to the ASR providers.<sup>5</sup>
- iii.) **TRS Program Management.** While the Commission has done commendable work managing the Telecommunications Relay Service (TRS) Fund, we have consistently asked that new technology improvements for any form of TRS service be encouraged regardless of the costs involved or the impact on the TRS Fund. To comply with Section 225, the Commission's primary focus must be on the benefits for the calling experience between those who are deaf and hard of hearing and their hearing contacts.<sup>6</sup>

- c.) **Live TV Captioning:** I expressed our appreciation for the Commission sending out a public notice on the recent petition from TDI and other consumer groups for declaratory ruling and/or rulemaking on Live Closed Captioning Quality Metrics and the Use of Automatic Speech Recognition (ASR) Technologies. In this petition, we urged the Commission to address near-term issues with the use of ASR by immediately issuing a declaratory ruling and/or expedited rule change with near-term guidance and policy on the application of the existing best practices to ASR. I underscored the importance of the Disability Advisory Committee working in sync, and avoiding working at cross purposes, with the Commission's development of a public record on this petition and ultimate development of caption quality metrics.<sup>7</sup>

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<sup>3</sup> <https://www.fcc.gov/trs-advisory-council-seeks-partial-reconsideration-vrs-rates-order>

<sup>4</sup> <https://docs.fcc.gov/public/attachments/DOC-354522A1.pdf>

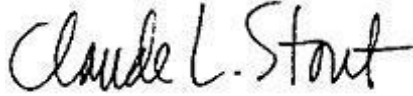
<sup>5</sup> <https://ecfsapi.fcc.gov/file/1092564956837/2019.09.25%20Consumer%20Groups%20and%20Researchers%20IP%20CTS%20ASR%20Application%20Comments%20Final.pdf>

<sup>6</sup> <https://ecfsapi.fcc.gov/file/7021748013.pdf>

<sup>7</sup> <https://ecfsapi.fcc.gov/file/10801131063733/2019.07.31%20Consumer%20Groups%20Caption%20Quality%20Petition%20for%20Declaratory%20Ruling%20and%20or%20Rulemaking%20final.pdf>

Please don't hesitate to let me know if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Claude L. Stout". The signature is written in a cursive, flowing style.

Claude L. Stout  
Executive Director  
Telecommunications for the Deaf and Hard of Hearing, Inc.

cc: Suzy Rosen Singleton, Chief, Disability Rights Office  
Eliot Greenwald, Deputy Chief, Disability Rights Office  
Debra Patkin, Attorney Advisory, Disability Rights Office

***for Deaf and Hard of Hearing People***